

# Privacy Policy

**Effective Date:** 12th of September 2024

At **Attila Tokolics ev.** ("we", "our", "us", "refinr.ai"), we are committed to protecting and respecting your privacy. This privacy policy outlines how we collect, use, store, and protect your personal information in compliance with the **General Data Protection Regulation (GDPR)**.

## 1. Data Controller

The data controller responsible for your personal information is:

- **Attila Tokolics ev.**
- Address: 8481 Somlóvásárhely, Vásár u. 12., Hungary
- VAT ID: 65724473
- Contact Email: mail@refinr.ai

## 2. Personal Data We Collect

We collect and process the following personal data:

- **Email:** Collected for user account management, communication, and authentication.
- **Billing Details:** Collected for payment processing and invoicing.

## 3. Purpose of Processing Your Data

We process your data for the following purposes:

- **User Account Management:** To create and manage your user account.
- **Billing and Payment:** To process payments through our third-party provider, Stripe.
- **Communication:** To contact you regarding your account, billing, or updates related to our services.

## 4. Third-Party Services

We use the following third-party services to store and process data:

- **AWS (Frankfurt, eu-central-1):** Our hosting provider, which securely stores your data.
- **Stripe:** Our payment processor for managing billing details. Stripe may collect additional information to process payments in compliance with their own privacy policy.

## 5. Cookies

We use **mandatory cookies** to support basic authentication and user session management. These cookies are necessary for the operation of the website and cannot be disabled.

## 6. User Rights

Under GDPR, you have the following rights regarding your personal data:

- **Right to Access:** You can request access to your personal data at any time.
- **Right to Rectification:** You can ask us to correct inaccurate or incomplete information about you.
- **Right to Deletion (Right to be Forgotten):** You can request the deletion of your data from our systems by contacting us at [mail@refinr.ai](mailto:mail@refinr.ai).
- **Right to Data Portability:** You can request an export of your personal data in a machine-readable format.
- **Right to Restriction of Processing:** You can request that we limit how we process your data.
- **Right to Object:** You have the right to object to the processing of your data in some circumstances.

To exercise any of these rights, please contact us at [mail@refinr.ai](mailto:mail@refinr.ai).

## 7. Data Retention

We retain your personal data as long as your account remains active. If you choose to delete your account, we will remove all of your personal data from our systems.

## 8. Data Security

We implement appropriate technical and organizational measures to protect your personal data against unauthorized access, accidental loss, destruction, or damage. This includes encryption, secure access controls, and hosting in an industry-standard secure environment (AWS Frankfurt, eu-central-1).

## 9. Data Sharing

We do not share your personal data with any third parties, except for those directly involved in the operation of our services (AWS and Stripe).

## 10. Data Transfers

Your data is stored and processed within the European Economic Area (EEA) on AWS servers located in Frankfurt (eu-central-1), ensuring GDPR compliance.

## 11. Age Restrictions

Our services do not impose any age restrictions. However, by using our services, you confirm that you are legally able to agree to this privacy policy.

## 12. Changes to This Privacy Policy

We may update this privacy policy from time to time. Any changes will be posted on this page with an updated revision date.

## 13. Contact Information

If you have any questions or concerns about this privacy policy or how we handle your data, please contact us at:

- **Attila Tokolics ev.**
- Address: 8481 Somlóvásárhely, Vásár u. 12., Hungary
- Email: [mail@refinr.ai](mailto:mail@refinr.ai)